

**EXHIBIT A**



**GELLERT  
SCALI  
BUSENKELL  
BROWN**

Attn: Team Systems International LLC

Team Systems International LLC  
Deborah Mott  
Steven Acosta

Invoice Date: April 25, 2022  
Invoice No. 38400  
Account No. 400290.001  
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RE: Team Systems International LLC Chapter 11 Case No. 22-10066 (C

INVOICE FOR PERIOD THROUGH 04/25/2022

Fees

					Hours	
03/07/2022	APG	B110	A104	Review docket and prepare service list	0.50	80.00
	APG	B160	A103	Draft/review Gellert Scali Busenkell & Brown retention motion	1.00	160.00
	APG	B110	A103	Draft/review motion to shorten	0.40	64.00
	APG	B110	A105	Various communications regarding motions and hearing	0.40	64.00
	APG	B110	A110	Retrieve and circulate various case filings	0.30	48.00
	BPL	B110	A106	Internal team meeting and call with client regarding pending motions and formulating strategy/responses	1.20	450.00
	BPL	L240	A104	Review/analyze motions to dismiss/convert	0.40	150.00
	BPL	L240	A102	Perform legal research and analysis concerning legal issues for motion to dismiss/convert	3.90	1,462.50
	BPL	L240	A103	Draft/review response in opposition to motion to dismiss/convert	4.00	1,500.00
	RSG	B110	A104	Review/analyze executed engagement letter and schedule meeting	0.40	190.00
	RSG	B110	A104	internal meeting with Brad and Margaret regarding: strategy and tasks	0.50	237.50
	RSG	L240	A104	Review/analyze draft objection	0.70	332.50
	RSG	B230	A104	draft DIP motion	1.00	475.00
	RSG	B110	A104	Review/analyze and draft motions to shorten on retention application and DIP	0.70	332.50
	RSG	B110	A104	emails and call with United States Trustee	0.40	190.00
	MFE	B110	A106	Initial discussions with client regarding status of case and upcoming deadlines	1.40	560.00
	MFE	L350	A103	Begin drafting opposition to GPDEV's Motion for Rule 37 Sanctions against Debtor	5.20	2,080.00
	MFE	L350	A106	Various e-mails to and from Debtor regarding opposition to Motion for Sanctions	0.40	160.00
	MFE	L350	A104	Review exhibits submitted by GPDEV for upcoming hearing	1.10	440.00

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				Hours	
	BPL	L350	A104 Review/analyze motion for sanctions	0.40	150.00
	BPL	L350	A104 Review/revise opposition to motion for sanctions	1.10	412.50
03/08/2022	APG	B190	A103 Draft/revise motion for leave to file late response	0.50	80.00
	APG	B110	A103 Revise agenda	0.50	80.00
	APG	B190	A103 Draft/revise witness and exhibit list	0.80	128.00
	APG	B110	A105 Communicate (in firm) regarding hearing appearances	0.20	32.00
	APG	B160	A111 Finalize and efile Gellert Scali Busenkell & Brown retention application	0.40	64.00
	APG	B230	A111 Finalize and efile DIP motion	0.40	64.00
	APG	B110	A111 Finalize and efile motion to shorten notice	0.20	32.00
	APG	B110	A107 Circulate filed copies of expedited motions and motion to shorten	0.20	32.00
	APG	L350	A111 Finalize and efile opposition to motion for sanctions	0.20	32.00
	APG	L240	A111 Finalize exhibits to response to motion to dismiss	0.60	96.00
	APG	B110	A110 Register various zoom appearances and circulate confirmations of same	0.50	80.00
	APG	B110	A106 Various communications regarding hearing and motions going forward	0.30	48.00
	APG	B160	A110 Assist with service of Gellert Scali Busenkell & Brown retention application	0.20	32.00
	APG	L240	A111 Finalize and efile response to motion to dismiss	0.40	64.00
	APG	B190	A111 Finalize and efile motion for leave to file late responses	0.20	32.00
	APG	B110	A111 Finalize and efile witness notice	0.20	32.00
	APG	B110	A111 Finalize and efile agenda	0.40	64.00
	APG	B110	A107 Circulate dropbox of filed documents to counsel	0.10	16.00
	APG	B110	A108 Coordinate service of documents with Parcels	0.20	32.00
	APG	B110	A105 Communications regarding exhibits for hearing	0.20	32.00
	BPL	L240	A103 Draft/revise response in opposition to motion to dismiss/convert	1.50	562.50
	BPL	L240	A101 Plan and prepare for 3/9 oral argument on motions to dismiss/convert and for sanctions, including preparation of argument and direct/cross examination outlines	4.70	1,762.50
	RB	B110	A110 Emails with A. Gollmann regarding agenda prep	0.40	52.00
	RB	B110	A110 Prepare and draft agenda per A. Gollmann email	1.50	195.00
	RB	B110	A110 Download all of the voluminous exhibits per D.I. 74 to cloud per M. England email	3.00	390.00
	RSG	B110	A104 call with client regarding: strategy and status	0.40	190.00
	RSG	B110	A104 call with Bering Strait counsel	0.30	142.50
	RSG	B110	A104 emails and call with Jenny Kasen	0.40	190.00
	RSG	B110	A104 several emails with clients, several more calls with same	0.50	237.50
	RSG	B230	A104 Review/analyze draft budget and term sheet for DIP	0.50	237.50
	RSG	B230	A104 Review/analyze, revise and circulate DIP motion for review	0.60	285.00
	RSG	L240	A104 Review/analyze objection to MTD	0.50	237.50
	RSG	L350	A104 Review/analyze objection to motion for sanctions	0.50	237.50
	RSG	B110	A104 Review/analyze emails regarding: evidentiary hearing, Mark St. Moritz	0.20	95.00
	MFE	L350	A103 Finalize and coordinate filing of opposition to GPDEV's Motion for Rule 37 Sanctions against Debtor	3.80	1,520.00

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				Hours	
MFE	L350	A106	E-mails to and from client regarding documents produced	0.30	120.00
MFE	B110	A103	Revise witness and exhibit list and coordinate filing	0.30	120.00
MFE	B190	A103	Revise motion for leave to file late objections	0.30	120.00
MFE	B110	A104	Review J. Goldblatt's chamber procedures	0.30	120.00
MFE	L350	A101	Prepare for upcoming hearing on Motion for Sanctions	2.80	1,120.00
MFE	B110	A103	Review and revise hearing agenda	0.30	120.00
MFE	L350	A106	Teleconference with client regarding hearing on Motion for Sanctions	0.80	320.00
MFE	L310	A104	Receive and review subpoena for Deborah Mott	0.30	120.00
BPL	L350	A103	Draft/revise response in opposition to motion for sanctions	1.00	375.00
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03/09/2022	APG	L240	A110 Retrieve and circulate creditor declarations	0.30	48.00
	APG	B110	A110 Print various hearing materials for M. England	0.40	64.00
	APG	L320	A110 Review document production for TD bank statements	0.30	48.00
	APG	B110	A106 Communicate (with client) regarding zoom log in	0.10	16.00
	APG	B310	A110 Retrieve and circulate IRS proof of claim	0.10	16.00
	BPL	L240	A109 Appear for/attend hearing on motion to dismiss/convert and for sanctions, including pre- and post-hearing strategy discussions with R. Gellert and M. England	8.80	3,300.00
	RSG	L240	A104 morning session of trial, review IRS claims	4.00	1,900.00
	RSG	L240	A104 afternoon session of trial, follow up emails regarding DIP structure	3.00	1,425.00
	RSG	B110	A104 discussions with Steve on status/strategy	0.30	142.50
	RSG	B110	A104 pre-hearing prep, review witness lists, documents	0.50	237.50
	MFE	B110	A104 Review UST's witness list	0.20	80.00
	MFE	L240	A109 Attend hearing on Motion to Dismiss case and Motion for Sanctions	8.50	3,400.00
	MFE	L340	A104 Receive and review report of Ryan Orner	0.40	160.00
	MFE	L350	A104 Receive and review declaration of G. Peterson	0.30	120.00
	MFE	L240	A105 Discussions with R. Gellert and B. Lehman regarding preparation for second day of hearing	0.30	120.00
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03/10/2022	BPL	B190	A107 Call with creditors' counsel, DoD counsel, and follow-up calls with R. Gellert and M. England	1.30	487.50
	BPL	B230	A107 Exchange emails with other counsel concerning hearing scheduling, DIP financing issues, and St. Moritz testimony	0.80	300.00
	BPL	L240	A101 Plan and prepare for ongoing hearing regarding motion to dismiss/convert and motion for sanctions, including preparation of additional direct/cross examination outlines	3.50	1,312.50
	BPL	B110	A106 Exchange various emails with client regarding providing further documentation concerning company's ongoing business, taxes, etc.	0.50	187.50
	APG	B110	A105 Various communications regarding hearings scheduled	0.40	64.00
	APG	B110	A108 Communications with chambers regarding zoom hearings	0.20	32.00
	APG	B110	A110 Update file	0.10	16.00
	RB	B110	A110 Download witness Exhibits 87 to Exhibit 90 to cloud per M. England email	0.50	65.00
	RSG	B230	A104 emails and call with Jenny regarding: DIP, exhibits etc	0.40	190.00
	RSG	B230	A104 Review/analyze emails, call with Bering Strait regarding: DIP,		

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				Hours	
			exhibits etc.	0.40	190.00
RSG	B110	A104	conference call with team regarding: status, strategy	0.50	237.50
RSG	B110	A104	Review/analyze internal discussions regarding: documents, witnesses with M. England and B. Lehman	0.40	190.00
RSG	B230	A104	review, revise and circulate DIP order	0.50	237.50
RSG	B230	A104	Review/analyze additional discussions on DIP	0.40	190.00
RSG	B110	A104	Review/analyze letter and status of tax returns	0.40	190.00
RSG	B230	A104	conference call on evidence objections, proceeding forward and DIP	0.80	380.00
MFE	L390	A107	Numerous e-mails to and from counsel for creditors regarding issues with exhibits	1.10	440.00
MFE	L390	A107	Participate in meet and confer with counsel for creditors and US Trustee regarding evidentiary issues	1.00	400.00
MFE	L390	A104	Review creditor's proposed exhibits to determine possible objections to admissibility	1.30	520.00
MFE	L390	A107	Teleconference with counsel for creditor regarding scheduling meet and confer and other objections	0.40	160.00
MFE	L390	A106	Discussions with client regarding evidentiary issues and documents	0.40	160.00
MFE	B190	A104	Review e-mails received from former counsel	0.30	120.00
MFE	B190	A104	Review and provide comments to proposed certification of counsel	0.30	120.00
MFE	L240	A107	Numerous e-mails to and from opposing parties and court regarding hearing scheduling and witness availability	0.40	160.00
03/11/2022	BPL	L240	Review/analyze discovery documents, exhibits, and expert report in order to prepare outline/analysis of transfers at issue for purposes of the motion to dismiss and for sanctions	1.80	675.00
	BPL	B110	Emails with client concerning documentation of company's ongoing business and review documents provided	0.50	187.50
APG	B190	A110	Upload order for leave to file late responses	0.20	32.00
APG	B110	A111	Finalize and efile agenda for hearing	0.60	96.00
APG	B110	A107	Circulate agenda to counsel	0.10	16.00
APG	B110	A108	Communicate with chambers regarding agenda filed	0.10	16.00
RSG	B110	A104	meet with M. England and B. Lehman before hearing, prepare	0.50	237.50
RSG	B110	A104	several emails and calls with Steve regarding: status, strategy etc.	0.40	190.00
RSG	B110	A104	emails and call with appellate counsel	0.30	142.50
RSG	B110	A104	Review/analyze and edit 3/14 agenda	0.30	142.50
MFE	B190	A104	Review proposed certification of counsel regarding exhibits and approve filing	0.20	80.00
MFE	B190	A104	Receive and review order granting motion to file late objection	0.20	80.00
03/13/2022	BPL	L240	Plan and prepare for upcoming continued hearing on motion to dismiss/convert and for sanctions, including argument and examination outlines/exhibits	3.20	1,200.00
	RSG	B110	Review/analyze emails/call with Steve, discuss with M. England, review exhibit objection outline	0.60	285.00

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					Hours	
03/14/2022	BPL	L240	A109	Prepare for and attend continued hearing on motions to dismiss/convert and for sanctions	5.90	2,212.50
	BPL	B110	A106	Call with client to follow up on the day's proceedings and strategy going forward	0.30	112.50
	BPL	L240	A103	Review/revise outline for closing argument regarding motions to dismiss/convert and for sanctions	0.80	300.00
	APG	B110	A110	Retrieve and circulate various hearing exhibits	0.40	64.00
	APG	B110	A108	Communications with chambers regarding zoom log in for hearings	0.20	32.00
	APG	B110	A111	Finalize and efile agenda for hearing	0.20	32.00
	APG	B110	A107	Communicate with counsel regarding zoom registration link	0.20	32.00
	APG	L350	A104	Review and circulate Mott deposition transcript	0.30	48.00
	APG	B110	A108	Circulate agenda to chambers	0.10	16.00
	APG	B110	A110	Update file	0.10	16.00
	RSG	L240	A104	continued hearing	5.90	2,802.50
	RSG	B110	A104	Review/analyze and prep for hearing	0.50	237.50
	RSG	L240	A104	Review/analyze revised document objection outline	0.40	190.00
	RSG	L350	A104	Review/analyze sanctions objection outline for argument	0.50	237.50
	RSG	B230	A104	revise and circulate DIP revisions, Review/analyze multiple emails on comments to same	0.80	380.00
	RSG	B110	A104	call and emails with client about status, next steps	0.50	237.50
	RSG	B110	A104	Review/analyze emails with United States Trustee	0.20	95.00
	MFE	L240	A101	Plan and prepare for continued hearing on motion to dismiss and motion for sanctions and argument on evidentiary issues	3.50	1,280.00
	MFE	L240	A109	Attend hearing on motion to dismiss or convert and motion for sanctions	3.60	1,440.00
03/15/2022	BPL	L240	A101	Plan and prepare for continued hearing on motions to dismiss/convert and for sanctions, including preparation of notes and <u>outlines</u>	3.50	1,312.50
	BPL	B230	A107	Exchange emails internally and with creditors' counsel concerning various outstanding matters, including DIP order	0.40	150.00
	RSG	B230	A104	Review/analyze emails to opp counsel regarding: status of DIP, comments	0.40	190.00
	RSG	B230	A104	Review/analyze DIP edits from opp counsel, prepare redline and Certification of counsel with opposing forms of order	0.90	427.50
	RSG	B110	A104	Review/analyze status of appeal, follow up with appellate counsel	0.30	142.50
	RSG	B110	A104	review/revise argument and circulate same for comment	0.80	380.00
	APG	B230	A104	Review communications regarding revised DIP order	0.40	64.00
	APG	B230	A111	Finalize and efile certification of counsel with competing DIP orders and redlines of same	0.60	96.00
	APG	B230	A108	Circulate filed Certification of counsel to chambers regarding competing DIP orders	0.10	16.00
	APG	B110	A107	Various communications regarding zoom hearing link	0.20	32.00
	MFE	L390	A107	Receive and review request from counsel for creditor regarding admissibility of Orner's report	0.30	120.00
03/16/2022	MB	B110	A104	Discuss closing argument with R. Gellert	0.10	45.00

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				Hours
BPL	B110	A107	Exchange emails with counsel to other parties concerning DIP order	0.30
BPL	L240	A109	Prepare for and attend continued hearing on motions to dismiss/convert and for sanctions	5.60
RSG	L240	A104	continued trial	4.50
RSG	B230	A104	prepare for hearing, DIP issues	0.80
RSG	B110	A104	discussion with Steve, Brad regarding: status, strategy, emails, calls	0.40
APG	B110	A104	Review various communications regarding hearing	0.40
APG	B110	A110	Print hearing materials for R. Gellert	0.10
MFE	L390	A104	Review/analyze request from counsel for creditor regarding admission of transcript of D. Mott and coding	0.20
03/17/2022	BPL	B230	A107 Exchange emails concerning DIP order	0.10
	RSG	B110	A104 Review/analyze emails, call with Acosta	0.70
	RSG	B230	A104 Review/analyze, submit and review DIP order	0.40
	RSG	L240	A104 Review/analyze status on FEMA claim	0.50
	RSG	B110	A104 follow up with appellate counsel	0.20
03/18/2022	BPL	L240	A106 Emails with client to follow up on motion to dismiss hearing and strategy	0.30
	RSG	B110	A104 Review/analyze several emails to/from Steve, review open items	0.50
	RSG	L240	A104 Review/analyze status of appeal, tax returns and FEMA claim	0.40
03/22/2022	RSG	B110	A104 emails from/to movants on status of items	0.40
	RSG	B110	A104 emails to/from steve regarding: status of claim, appeal	0.30
	RSG	B160	A104 Review/analyze status of Venable retention	0.30
03/23/2022	BPL	L240	A106 Discussion with client and internally regarding status of FEMA claims	0.60
	BPL	L240	A107 Call with debtor's counsel at Venable concerning status of FEMA claims and timing of submission of newer claim	0.50
	BPL	L240	A103 Prepare letter to court regarding issues with prior testimony concerning newer FEMA claim	0.60
	BPL	L240	A105 Discussion with R. Gellert and M. England regarding issues with prior testimony concerning FEMA claim status	0.20
	RSG	B160	A104 emails and conference call with Venable counsel regarding: status	0.60
	RSG	B160	A104 discuss with Brad and Margaret regarding: strategy and Venable retention	0.30
	RSG	B110	A104 several email to/from Steve regarding: status	0.40
	RSG	B110	A104 Review/analyze emails from/to Cabot	0.40
	MFE	L240	A105 Various discussions with R. Gellert and B. Lehman regarding engagement of Venable	0.40
	MFE	L240	A106 E-mail to S. Acosta regarding engagement of Venable	0.40
03/24/2022	BPL	L240	A103 Draft/revise letter to Court regarding inaccurate prior testimony concerning FEMA claim status	0.80
				300.00

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BPL	L240	A107	Emails and call with opposing counsel concerning FEMA claim status issues	0.30
BPL	B160	A107	Emails with US Trustee and opposing counsel concerning ordinary course professional issues	0.70
RSG	B110	A104	call / email from/to Mike Moody	0.20
RSG	B110	A104	Review/analyze emails requesting standstill until entry of decision, circulate same	0.40
RSG	B110	A104	Review/analyze follow up emails with Cabot et al on status	0.40
RSG	L240	A104	Review/analyze draft letter to Court correcting testimony regarding FEMA claim, discussions regarding: same	0.50
RSG	B160	A104	Review/analyze Venable situation with Brad and Margaret	0.40
RSG	B110	A104	Review/analyze emails on outstanding MOR	0.30
APG	L240	A105	Various communications regarding letter regarding FEMA claim	0.30
APG	L240	A111	Finalize and efile letter regarding FEMA claim	0.20
APG	L240	A108	Circulate filed letter regarding FEMA claim to chambers	0.10
APG	B110	A104	Review communication regarding status of case	0.20
APG	B160	A104	Review communications regarding OCP declarations	0.40
MFE	B160	A103	Review and revise letter to court regarding Venable engagement	0.30
MFE	B160	A107	Numerous e-mails from opposing counsel regarding engagement of Venable	0.80
03/25/2022	BPL	L240	Review/analyze Bering Straits' filing regarding FEMA claim status	0.20
	BPL	B190	Discussion regarding strategy with R. Gellert and M. England	0.40
	RSG	B110	Review/analyze and circulate Bering reply letter on candor letter from debtor	0.80
	RSG	B160	Review/analyze Venable retention application/disinterestedness	0.30
	RSG	B110	Review/analyze emails from/to Steve regarding: status	0.30
	MFE	B160	Receive and review court submission from Bearing Straits regarding engagement of Venable	0.30
03/30/2022	APG	L240	Review and circulate memorandum opinion regarding motion to dismiss	0.30
	RSG	L240	Review/analyze emails and calls regarding: opinion	0.50
	RSG	L240	Review/analyze and circulate opinion	0.50
	RSG	B110	call with Steve regarding: status	0.30
	MFE	L240	Receive and review court's ruling converting case to Chapter 7	0.50
03/31/2022	BPL	B110	Review proposed conversion order and exchange emails with other counsel regarding same	0.40
	BPL	B110	Review court's opinion regarding conversion of case to Chapter 7	0.60
	RSG	L240	Review/analyze continue review of opinion	0.40
	RSG	L240	Review/analyze follow up call with Steve on opinion and what happens next	0.40
	RSG	B110	Review/analyze email and call with chapter 7 trustee	0.70

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				Hours		
	RSG	B110	A104	Review/analyze proposed order from UST converting case, emails regarding: same	0.70	332.50
	RSG	B160	A104	obtain hearing date on retention and first and final fee app	0.40	190.00
	RSG	B110	A104	email parties regarding: obtaining hearing date	0.20	95.00
	RSG	B110	A104	Review/analyze follow up call with Steve	0.30	142.50
	APG	B160	A105	Communicate with R. Gellert regarding Gellert Scali Busenkell & Brown retention application	0.10	16.00
	APG	B110	A108	Communications regarding omnibus hearing date	0.20	32.00
	APG	B110	A111	Finalize and efile certification of counsel regarding omnibus hearing date	0.10	16.00
	APG	B160	A111	Finalize and efile notice of hearing for Gellert Scali Busenkell & Brown retention application	0.20	32.00
	APG	B160	A107	Circulate notice of hearing for Gellert Scali Busenkell & Brown retention application	0.10	16.00
	APG	B160	A105	Calendar objection deadline and hearing date for Gellert Scali Busenkell & Brown retention application	0.10	16.00
	APG	B110	A110	Retrieve and circulate order converting case to chapter 7	0.20	32.00
	APG	B110	A105	Calendar dates/deadlines regarding conversion to chapter 7	0.10	16.00
	MFE	L240	A107	Various e-mails from opposing counsel regarding order implementing court's opinion	0.30	120.00
04/01/2022	RSG	B110	A104	Review/analyze emails with trustee and calls with Trustee	1.00	475.00
	RSG	B110	A104	Review/analyze emails with Steve and calls with Steve	1.00	475.00
	RSG	B110	A104	Review/analyze entry of order and formal selection of trustee	0.60	285.00
	RSG	B150	A104	Review/analyze notice of 341 meeting and circulate	0.40	190.00
	RSG	B110	A104	Review/analyze emails regarding: bank account number	0.30	142.50
04/11/2022	APG	B160	A103	Begin draft of Gellert Scali Busenkell & Brown first and final fee application	0.60	96.00
04/19/2022	APG	B160	A103	Draft/revise task code billing report for Gellert Scali Busenkell & Brown first and final fee application	0.50	80.00
04/22/2022	APG	B160	A103	Revise task code billing report for Gellert Scali Busenkell & Brown first and final fee application	1.50	240.00
04/25/2022	APG	B160	A103	Revise Gellert Scali Busenkell & Brown first and final fee application	2.00	320.00
				For Current Services Rendered	187.40	70,529.00

#### Recapitulation

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Ronald S. Gellert	54.90	\$475.00	\$26,077.50
Michael Busenkell	0.10	450.00	45.00
Margaret F. England	43.20	400.00	17,160.00
Richard Bennett	5.40	130.00	702.00
Ashley P. Gollmann	22.70	160.00	3,632.00
Bradley P. Lehman	61.10	375.00	22,912.50

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Expenses

Miscellaneous	1,034.88
Postage	45.20
Bankruptcy Photocopies	178.60
Total Expenses Thru 04/25/2022	<u>1,258.68</u>
 Total Current Work	 71,787.68

Balance Due \$71,787.68

Task Code Summary

		Fees	Expenses
B110	Case Administration	14682.50	1258.68
B150	Meetings of and Communications with Creditors	190.00	0.00
B160	Fee/Employment Applications	3051.00	0.00
B190	Other Contested Matters (excluding assumption/rejection motions)	1429.50	0.00
B100	Administration	19,353.00	1,258.68
B230	Financing/Cash Collections	4480.00	0.00
B200	Operations	4,480.00	0.00
B310	Claims Administration and Objections	16.00	0.00
B300	Claims and Plan	16.00	0.00
L240	Dispositive Motions	37099.50	0.00
L200	Pre-Trial Pleadings and Motions	37,099.50	0.00
L310	Written Discovery	120.00	0.00
L320	Document Production	48.00	0.00
L340	Expert Discovery	160.00	0.00
L350	Discovery Motions	7372.50	0.00
L390	Other Discovery	1880.00	0.00
L300	Discovery	9,580.50	0.00

PAYMENTS RECEIVED AFTER 04/25/2022 WILL APPEAR ON YOUR NEXT STATEMENT

Please send all payments to Delaware address below and include invoice number and/or account number on payment. Thank You

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**GELLERT  
SCALI  
BUSENKELL  
BROWN**

Team Systems International LLC  
Deborah Mott  
Steven Acosta

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RE: Team Systems International LLC Chapter 11 Case No. 22-10066 (C

Duplicate

#### INVOICE FOR PERIOD THROUGH 04/25/2022

##### Fees

				Hours	Amount
03/07/2022	APG	B110	A104	0.50	80.00
	APG	B160	A103	1.00	160.00
	APG	B110	A103	0.40	64.00
	APG	B110	A105	0.40	64.00
	APG	B110	A110	0.30	48.00
	BPL	B110	A106	1.20	450.00
	BPL	L240	A104	0.40	150.00
	BPL	L240	A102	3.90	1,462.50
	BPL	L240	A103	4.00	1,500.00
	RSG	B110	A104	0.40	190.00
	RSG	B110	A104	0.50	237.50
	RSG	L240	A104	0.70	332.50
	RSG	B230	A104	1.00	475.00
	RSG	B110	A104	0.70	332.50
	RSG	B110	A104	0.40	190.00
	MFE	B110	A106	1.40	560.00
	MFE	L350	A103		

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[www.GSBBLAW.com](http://www.GSBBLAW.com)

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				Hours	
			Sanctions against Debtor	5.20	2,080.00
	MFE	L350	A106 Various e-mails to and from Debtor regarding opposition to Motion for Sanctions	0.40	160.00
	MFE	L350	A104 Review exhibits submitted by GPDEV for upcoming hearing	1.10	440.00
	BPL	L350	A104 Review/analyze motion for sanctions	0.40	150.00
	BPL	L350	A104 Review/revise opposition to motion for sanctions	1.10	412.50
03/08/2022	APG	B190	A103 Draft/revise motion for leave to file late response	0.50	80.00
	APG	B110	A103 Revise agenda	0.50	80.00
	APG	B190	A103 Draft/revise witness and exhibit list	0.80	128.00
	APG	B110	A105 Communicate (in firm) regarding hearing appearances	0.20	32.00
	APG	B160	A111 Finalize and efile Gellert Scali Busenkell & Brown retention application	0.40	64.00
	APG	B230	A111 Finalize and efile DIP motion	0.40	64.00
	APG	B110	A111 Finalize and efile motion to shorten notice	0.20	32.00
	APG	B110	A107 Circulate filed copies of expedited motions and motion to shorten	0.20	32.00
	APG	L350	A111 Finalize and efile opposition to motion for sanctions	0.20	32.00
	APG	L240	A111 Finalize exhibits to response to motion to dismiss	0.60	96.00
	APG	B110	A110 Register various zoom appearances and circulate confirmations of same	0.50	80.00
	APG	B110	A106 Various communications regarding hearing and motions going forward	0.30	48.00
	APG	B160	A110 Assist with service of Gellert Scali Busenkell & Brown retention application	0.20	32.00
	APG	L240	A111 Finalize and efile response to motion to dismiss	0.40	64.00
	APG	B190	A111 Finalize and efile motion for leave to file late responses	0.20	32.00
	APG	B110	A111 Finalize and efile witness notice	0.20	32.00
	APG	B110	A111 Finalize and efile agenda	0.40	64.00
	APG	B110	A107 Circulate dropbox of filed documents to counsel	0.10	16.00
	APG	B110	A108 Coordinate service of documents with Parcels	0.20	32.00
	APG	B110	A105 Communications regarding exhibits for hearing	0.20	32.00
	BPL	L240	A103 Draft/revise response in opposition to motion to dismiss/convert	1.50	562.50
	BPL	L240	A101 Plan and prepare for 3/9 oral argument on motions to dismiss/convert and for sanctions, including preparation of argument and direct/cross examination outlines	4.70	1,762.50
	RB	B110	A110 Emails with A. Gollmann regarding agenda prep	0.40	52.00
	RB	B110	A110 Prepare and draft agenda per A. Gollmann email	1.50	195.00
	RB	B110	A110 Download all of the voluminous exhibits per D.I. 74 to cloud per M. England email	3.00	390.00
	RSG	B110	A104 call with client regarding: strategy and status	0.40	190.00
	RSG	B110	A104 call with Bering Strait counsel	0.30	142.50
	RSG	B110	A104 emails and call with Jenny Kasen	0.40	190.00
	RSG	B110	A104 several emails with clients, several more calls with same	0.50	237.50
	RSG	B230	A104 Review/analyze draft budget and term sheet for DIP	0.50	237.50
	RSG	B230	A104 Review/analyze, revise and circulate DIP motion for review	0.60	285.00
	RSG	L240	A104 Review/analyze objection to MTD	0.50	237.50
	RSG	L350	A104 Review/analyze objection to motion for sanctions	0.50	237.50

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				Hours
	RSG	B110	A104 Review/analyze emails regarding: evidentiary hearing, Mark St. Moritz	0.20 95.00
	MFE	L350	A103 Finalize and coordinate filing of opposition to GPDEV's Motion for Rule 37 Sanctions against Debtor	3.80 1,520.00
	MFE	L350	A106 E-mails to and from client regarding documents produced	0.30 120.00
	MFE	B110	A103 Revise witness and exhibit list and coordinate filing	0.30 120.00
	MFE	B190	A103 Revise motion for leave to file late objections	0.30 120.00
	MFE	B110	A104 Review J. Goldblatt's chamber procedures	0.30 120.00
	MFE	L350	A101 Prepare for upcoming hearing on Motion for Sanctions	2.80 1,120.00
	MFE	B110	A103 Review and revise hearing agenda	0.30 120.00
	MFE	L350	A106 Teleconference with client regarding hearing on Motion for Sanctions	0.80 320.00
	MFE	L310	A104 Receive and review subpoena for Deborah Mott	0.30 120.00
	BPL	L350	A103 Draft/revise response in opposition to motion for sanctions	1.00 375.00
03/09/2022	APG	L240	A110 Retrieve and circulate creditor declarations	0.30 48.00
	APG	B110	A110 Print various hearing materials for M. England	0.40 64.00
	APG	L320	A110 Review document production for TD bank statements	0.30 48.00
	APG	B110	A106 Communicate (with client) regarding zoom log in	0.10 16.00
	APG	B310	A110 Retrieve and circulate IRS proof of claim	0.10 16.00
	BPL	L240	A109 Appear for/attend hearing on motion to dismiss/convert and for sanctions, including pre- and post-hearing strategy discussions with R. Gellert and M. England	8.80 3,300.00
	RSG	L240	A104 morning session of trial, review IRS claims	4.00 1,900.00
	RSG	L240	A104 afternoon session of trial, follow up emails regarding DIP structure	3.00 1,425.00
	RSG	B110	A104 discussions with Steve on status/strategy	0.30 142.50
	RSG	B110	A104 pre-hearing prep, review witness lists, documents	0.50 237.50
	MFE	B110	A104 Review UST's witness list	0.20 80.00
	MFE	L240	A109 Attend hearing on Motion to Dismiss case and Motion for Sanctions	8.50 3,400.00
	MFE	L340	A104 Receive and review report of Ryan Orner	0.40 160.00
	MFE	L350	A104 Receive and review declaration of G. Peterson	0.30 120.00
	MFE	L240	A105 Discussions with R. Gellert and B. Lehman regarding preparation for second day of hearing	0.30 120.00
03/10/2022	BPL	B190	A107 Call with creditors' counsel, DoD counsel, and follow-up calls with R. Gellert and M. England	1.30 487.50
	BPL	B230	A107 Exchange emails with other counsel concerning hearing scheduling, DIP financing issues, and St. Moritz testimony	0.80 300.00
	BPL	L240	A101 Plan and prepare for ongoing hearing regarding motion to dismiss/convert and motion for sanctions, including preparation of additional direct/cross examination outlines	3.50 1,312.50
	BPL	B110	A106 Exchange various emails with client regarding providing further documentation concerning company's ongoing business, taxes, etc.	0.50 187.50
	APG	B110	A105 Various communications regarding hearings scheduled	0.40 64.00
	APG	B110	A108 Communications with chambers regarding zoom hearings	0.20 32.00
	APG	B110	A110 Update file	0.10 16.00

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				Hours
RB	B110	A110	Download witness Exhibits 87 to Exhibit 90 to cloud per M. England email	0.50 65.00
RSG	B230	A104	emails and call with Jenny regarding: DIP, exhibits etc	0.40 190.00
RSG	B230	A104	Review/analyze emails, call with Bering Strait regarding: DIP, exhibits etc.	0.40 190.00
RSG	B110	A104	conference call with team regarding: status, strategy	0.50 237.50
RSG	B110	A104	Review/analyze internal discussions regarding: documents, witnesses with M. England and B. Lehman	0.40 190.00
RSG	B230	A104	review, revise and circulate DIP order	0.50 237.50
RSG	B230	A104	Review/analyze additional discussions on DIP	0.40 190.00
RSG	B110	A104	Review/analyze letter and status of tax returns	0.40 190.00
RSG	B230	A104	conference call on evidence objections, proceeding forward and DIP	0.80 380.00
MFE	L390	A107	Numerous e-mails to and from counsel for creditors regarding issues with exhibits	1.10 440.00
MFE	L390	A107	Participate in meet and confer with counsel for creditors and US Trustee regarding evidentiary issues	1.00 400.00
MFE	L390	A104	Review creditor's proposed exhibits to determine possible objections to admissibility	1.30 520.00
MFE	L390	A107	Teleconference with counsel for creditor regarding scheduling meet and confer and other objections	0.40 160.00
MFE	L390	A106	Discussions with client regarding evidentiary issues and documents	0.40 160.00
MFE	B190	A104	Review e-mails received from former counsel	0.30 120.00
MFE	B190	A104	Review and provide comments to proposed certification of counsel	0.30 120.00
MFE	L240	A107	Numerous e-mails to and from opposing parties and court regarding hearing scheduling and witness availability	0.40 160.00
03/11/2022	BPL	L240	Review/analyze discovery documents, exhibits, and expert report in order to prepare outline/analysis of transfers at issue for purposes of the motion to dismiss and for sanctions	1.80 675.00
	BPL	B110	Emails with client concerning documentation of company's ongoing business and review documents provided	0.50 187.50
	APG	B190	Upload order for leave to file late responses	0.20 32.00
	APG	B110	Finalize and efile agenda for hearing	0.60 96.00
	APG	B110	Circulate agenda to counsel	0.10 16.00
	APG	B110	Communicate with chambers regarding agenda filed	0.10 16.00
	RSG	B110	meet with M. England and B. Lehman before hearing, prepare	0.50 237.50
	RSG	B110	several emails and calls with Steve regarding: status, strategy etc.	0.40 190.00
	RSG	B110	emails and call with appellate counsel	0.30 142.50
	RSG	B110	Review/analyze and edit 3/14 agenda	0.30 142.50
	MFE	B190	Review proposed certification of counsel regarding exhibits and approve filing	0.20 80.00
	MFE	B190	Receive and review order granting motion to file late objection	0.20 80.00
03/13/2022	BPL	L240	Plan and prepare for upcoming continued hearing on motion to dismiss/convert and for sanctions, including argument and	

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					Hours	
			examination outlines/exhibits		3.20	1,200.00
	RSG	B110	A104	Review/analyze emails/call with Steve, discuss with M. England, review exhibit objection outline	0.60	285.00
03/14/2022	BPL	L240	A109	Prepare for and attend continued hearing on motions to dismiss/convert and for sanctions	5.90	2,212.50
	BPL	B110	A106	Call with client to follow up on the day's proceedings and strategy going forward	0.30	112.50
	BPL	L240	A103	Review/revise outline for closing argument regarding motions to dismiss/convert and for sanctions	0.80	300.00
	APG	B110	A110	Retrieve and circulate various hearing exhibits	0.40	64.00
	APG	B110	A108	Communications with chambers regarding zoom log in for hearings	0.20	32.00
	APG	B110	A111	Finalize and efile agenda for hearing	0.20	32.00
	APG	B110	A107	Communicate with counsel regarding zoom registration link	0.20	32.00
	APG	L350	A104	Review and circulate Mott deposition transcript	0.30	48.00
	APG	B110	A108	Circulate agenda to chambers	0.10	16.00
	APG	B110	A110	Update file	0.10	16.00
	RSG	L240	A104	continued hearing	5.90	2,802.50
	RSG	B110	A104	Review/analyze and prep for hearing	0.50	237.50
	RSG	L240	A104	Review/analyze revised document objection outline	0.40	190.00
	RSG	L350	A104	Review/analyze sanctions objection outline for argument	0.50	237.50
	RSG	B230	A104	revise and circulate DIP revisions, Review/analyze multiple emails on comments to same	0.80	380.00
	RSG	B110	A104	call and emails with client about status, next steps	0.50	237.50
	RSG	B110	A104	Review/analyze emails with United States Trustee	0.20	95.00
	MFE	L240	A101	Plan and prepare for continued hearing on motion to dismiss and motion for sanctions and argument on evidentiary issues	3.50	1,280.00
	MFE	L240	A109	Attend hearing on motion to dismiss or convert and motion for sanctions	3.60	1,440.00
03/15/2022	BPL	L240	A101	Plan and prepare for continued hearing on motions to dismiss/convert and for sanctions, including preparation of notes and <u>outlines</u>	3.50	1,312.50
	BPL	B230	A107	Exchange emails internally and with creditors' counsel concerning various outstanding matters, including DIP order	0.40	150.00
	RSG	B230	A104	Review/analyze emails to opp counsel regarding: status of DIP, comments	0.40	190.00
	RSG	B230	A104	Review/analyze DIP edits from opp counsel, prepare redline and Certification of counsel with opposing forms of order	0.90	427.50
	RSG	B110	A104	Review/analyze status of appeal, follow up with appellate counsel	0.30	142.50
	RSG	B110	A104	review/revise argument and circulate same for comment	0.80	380.00
	APG	B230	A104	Review communications regarding revised DIP order	0.40	64.00
	APG	B230	A111	Finalize and efile certification of counsel with competing DIP orders and redlines of same	0.60	96.00
	APG	B230	A108	Circulate filed Certification of counsel to chambers regarding competing DIP orders	0.10	16.00
	APG	B110	A107	Various communications regarding zoom hearing link	0.20	32.00

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					Hours
03/16/2022	MFE	L390	A107	Receive and review request from counsel for creditor regarding admissibility of Orner's report	0.30
	MB	B110	A104	Discuss closing argument with R. Gellert	0.10
	BPL	B110	A107	Exchange emails with counsel to other parties concerning DIP order	0.30
	BPL	L240	A109	Prepare for and attend continued hearing on motions to dismiss/convert and for sanctions	5.60
	RSG	L240	A104	continued trial	4.50
	RSG	B230	A104	prepare for hearing, DIP issues	0.80
	RSG	B110	A104	discussion with Steve, Brad regarding: status, strategy, emails, calls	0.40
	APG	B110	A104	Review various communications regarding hearing	0.40
	APG	B110	A110	Print hearing materials for R. Gellert	0.10
03/17/2022	MFE	L390	A104	Review/analyze request from counsel for creditor regarding admission of transcript of D. Mott and coding	0.20
	BPL	B230	A107	Exchange emails concerning DIP order	0.10
	RSG	B110	A104	Review/analyze emails, call with Acosta	0.70
	RSG	B230	A104	Review/analyze, submit and review DIP order	0.40
	RSG	L240	A104	Review/analyze status on FEMA claim	0.50
03/18/2022	RSG	B110	A104	follow up with appellate counsel	0.20
	BPL	L240	A106	Emails with client to follow up on motion to dismiss hearing and strategy	0.30
	RSG	B110	A104	Review/analyze several emails to/from Steve, review open items	0.50
	RSG	L240	A104	Review/analyze status of appeal, tax returns and FEMA claim	0.40
03/22/2022	RSG	B110	A104	emails from/to movants on status of items	0.40
	RSG	B110	A104	emails to/from steve regarding: status of claim, appeal	0.30
	RSG	B160	A104	Review/analyze status of Venable retention	0.30
03/23/2022	BPL	L240	A106	Discussion with client and internally regarding status of FEMA claims	0.60
	BPL	L240	A107	Call with debtor's counsel at Venable concerning status of FEMA claims and timing of submission of newer claim	0.50
	BPL	L240	A103	Prepare letter to court regarding issues with prior testimony concerning newer FEMA claim	0.60
	BPL	L240	A105	Discussion with R. Gellert and M. England regarding issues with prior testimony concerning FEMA claim status	0.20
	RSG	B160	A104	emails and conference call with Venable counsel regarding: status	0.60
	RSG	B160	A104	discuss with Brad and Margaret regarding: strategy and Venable retention	0.30
	RSG	B110	A104	several email to/from Steve regarding: status	0.40
	RSG	B110	A104	Review/analyze emails from/to Cabot	0.40
	MFE	L240	A105	Various discussions with R. Gellert and B. Lehman regarding engagement of Venable	0.40

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					Hours	
	MFE	L240	A106	E-mail to S. Acosta regarding engagement of Venable	0.40	160.00
03/24/2022	BPL	L240	A103	Draft/review letter to Court regarding inaccurate prior testimony concerning FEMA claim status	0.80	300.00
	BPL	L240	A107	Emails and call with opposing counsel concerning FEMA claim status issues	0.30	112.50
	BPL	B160	A107	Emails with US Trustee and opposing counsel concerning ordinary course professional issues	0.70	262.50
	RSG	B110	A104	call / email from/to Mike Moody	0.20	95.00
	RSG	B110	A104	Review/analyze emails requesting standstill until entry of decision, circulate same	0.40	190.00
	RSG	B110	A104	Review/analyze follow up emails with Cabot et al on status	0.40	190.00
	RSG	L240	A104	Review/analyze draft letter to Court correcting testimony regarding FEMA claim, discussions regarding: same	0.50	237.50
	RSG	B160	A104	Review/analyze Venable situation with Brad and Margaret	0.40	190.00
	RSG	B110	A104	Review/analyze emails on outstanding MOR	0.30	142.50
	APG	L240	A105	Various communications regarding letter regarding FEMA claim	0.30	48.00
	APG	L240	A111	Finalize and efile letter regarding FEMA claim	0.20	32.00
	APG	L240	A108	Circulate filed letter regarding FEMA claim to chambers	0.10	16.00
	APG	B110	A104	Review communication regarding status of case	0.20	32.00
	APG	B160	A104	Review communications regarding OCP declarations	0.40	64.00
	MFE	B160	A103	Review and revise letter to court regarding Venable engagement	0.30	120.00
	MFE	B160	A107	Numerous e-mails from opposing counsel regarding engagement of Venable	0.80	320.00
03/25/2022	BPL	L240	A104	Review/analyze Bering Straits' filing regarding FEMA claim status	0.20	75.00
	BPL	B190	A105	Discussion regarding strategy with R. Gellert and M. England	0.40	150.00
	RSG	B110	A104	Review/analyze and circulate Bering reply letter on candor letter from debtor	0.80	380.00
	RSG	B160	A104	Review/analyze Venable retention application/disinterestedness	0.30	142.50
	RSG	B110	A104	Review/analyze emails from/to Steve regarding: status	0.30	142.50
	MFE	B160	A104	Receive and review court submission from Bearing Straits regarding engagement of Venable	0.30	120.00
03/30/2022	APG	L240	A104	Review and circulate memorandum opinion regarding motion to dismiss	0.30	48.00
	RSG	L240	A104	Review/analyze emails and calls regarding: opinion	0.50	237.50
	RSG	L240	A104	Review/analyze and circulate opinion	0.50	237.50
	RSG	B110	A104	call with Steve regarding: status	0.30	142.50
	MFE	L240	A104	Receive and review court's ruling converting case to Chapter 7	0.50	200.00
03/31/2022	BPL	B110	A107	Review proposed conversion order and exchange emails with other counsel regarding same	0.40	150.00
	BPL	B110	A104	Review court's opinion regarding conversion of case to Chapter 7	0.60	225.00

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				Hours	
RSG	L240	A104	Review/analyze continue review of opinion	0.40	190.00
RSG	L240	A104	Review/analyze follow up call with Steve on opinion and what happens next	0.40	190.00
RSG	B110	A104	Review/analyze email and call with chapter 7 trustee	0.70	332.50
RSG	B110	A104	Review/analyze proposed order from UST converting case, emails regarding: same	0.70	332.50
RSG	B160	A104	obtain hearing date on retention and first and final fee app	0.40	190.00
RSG	B110	A104	email parties regarding: obtaining hearing date	0.20	95.00
RSG	B110	A104	Review/analyze follow up call with Steve	0.30	142.50
APG	B160	A105	Communicate with R. Gellert regarding Gellert Scali Busenkell & Brown retention application	0.10	16.00
APG	B110	A108	Communications regarding omnibus hearing date	0.20	32.00
APG	B110	A111	Finalize and efile certification of counsel regarding omnibus hearing date	0.10	16.00
APG	B160	A111	Finalize and efile notice of hearing for Gellert Scali Busenkell & Brown retention application	0.20	32.00
APG	B160	A107	Circulate notice of hearing for Gellert Scali Busenkell & Brown retention application	0.10	16.00
APG	B160	A105	Calendar objection deadline and hearing date for Gellert Scali Busenkell & Brown retention application	0.10	16.00
APG	B110	A110	Retrieve and circulate order converting case to chapter 7	0.20	32.00
APG	B110	A105	Calendar dates/deadlines regarding conversion to chapter 7	0.10	16.00
MFE	L240	A107	Various e-mails from opposing counsel regarding order implementing court's opinion	0.30	120.00
04/01/2022	RSG	B110	A104 Review/analyze emails with trustee and calls with Trustee	1.00	475.00
	RSG	B110	A104 Review/analyze emails with Steve and calls with Steve	1.00	475.00
	RSG	B110	A104 Review/analyze entry of order and formal selection of trustee	0.60	285.00
	RSG	B150	A104 Review/analyze notice of 341 meeting and circulate	0.40	190.00
	RSG	B110	A104 Review/analyze emails regarding: bank account number	0.30	142.50
04/11/2022	APG	B160	A103 Begin draft of Gellert Scali Busenkell & Brown first and final fee application	0.60	96.00
04/19/2022	APG	B160	A103 Draft/revise task code billing report for Gellert Scali Busenkell & Brown first and final fee application	0.50	80.00
04/22/2022	APG	B160	A103 Revise task code billing report for Gellert Scali Busenkell & Brown first and final fee application	1.50	240.00
04/25/2022	APG	B160	A103 Revise Gellert Scali Busenkell & Brown first and final fee application	2.00	320.00
			For Current Services Rendered	187.40	70,529.00

#### Recapitulation

Timekeeper	Hours	Rate	Total
Ronald S. Gellert	54.90	\$475.00	\$26,077.50
Michael Busenkell	0.10	450.00	45.00
Margaret F. England	43.20	400.00	17,160.00

1201 N. ORANGE STREET  
 SUITE 300  
 WILMINGTON, DELAWARE 19801  
 P: 302. 425. 5800 | F: 302. 425. 5814

8 PENN CENTER  
 1628 JOHN F. KENNEDY BLVD, SUITE 1901  
 PHILADELPHIA, PENNSYLVANIA 19103  
 P: 215. 238. 0010 | F: 215. 238. 0016

Team Systems International LLC  
 Account No. 400290.001  
 RE: Team Systems International LLC C

Invoice Date: 04/25/2022  
 Invoice No. 38400  
 Page No. 9

<u>Timekeeper</u>	<u>Hours</u>	<u>Rate</u>	<u>Total</u>
Richard Bennett	5.40	130.00	702.00
Ashley P. Gollmann	22.70	160.00	3,632.00
Bradley P. Lehman	61.10	375.00	22,912.50

Expenses

Miscellaneous	1,034.88
Postage	45.20
Bankruptcy Photocopies	178.60
Total Expenses Thru 04/25/2022	<u>1,258.68</u>
 Total Current Work	 71,787.68
 Balance Due	 <u>\$71,787.68</u>

Task Code Summary

	<u>Fees</u>	<u>Expenses</u>
B110 Case Administration	14682.50	1258.68
B150 Meetings of and Communications with Creditors	190.00	0.00
B160 Fee/Employment Applications	3051.00	0.00
B190 Other Contested Matters (excluding assumption/rejection motions)	1429.50	0.00
B100 Administration	19,353.00	1,258.68
 B230 Financing/Cash Collections	 4480.00	 0.00
B200 Operations	4,480.00	0.00
 B310 Claims Administration and Objections	 16.00	 0.00
B300 Claims and Plan	16.00	0.00
 L240 Dispositive Motions	 37099.50	 0.00
L200 Pre-Trial Pleadings and Motions	37,099.50	0.00
 L310 Written Discovery	 120.00	 0.00
L320 Document Production	48.00	0.00
L340 Expert Discovery	160.00	0.00
L350 Discovery Motions	7372.50	0.00
L390 Other Discovery	1880.00	0.00
L300 Discovery	9,580.50	0.00

PAYMENTS RECEIVED AFTER 04/25/2022 WILL APPEAR ON YOUR NEXT STATEMENT

Please send all payments to Delaware address below and include invoice number and/or account number on payment. Thank You

1201 N. ORANGE STREET  
 SUITE 300  
 WILMINGTON, DELAWARE 19801  
 P: 302. 425. 5800 | F: 302. 425. 5814

8 PENN CENTER  
 1628 JOHN F. KENNEDY BLVD, SUITE 1901  
 PHILADELPHIA, PENNSYLVANIA 19103  
 P: 215. 238. 0010 | F: 215. 238. 0016

Statements Printed:	1
Hours:	187.40
Fees:	70,529.00
Expenses:	1,258.68

## Detail Task Code Billing Report

400290 001

Gellert Scali Busenkell &amp; Brown, LLC

Trans Date	Tkpr	Tcode/ Task Code	Rate	Units	Hours to Bill	Amount
<b>Fees</b>						
03/07/2022	APG	B110	A104	160.00	0.50	80.00 Review docket and prepare service list
03/07/2022	APG	B110	A103	160.00	0.40	64.00 Draft/revise motion to shorten
03/07/2022	APG	B110	A105	160.00	0.40	64.00 Various communications regarding motions and hearing
03/07/2022	APG	B110	A110	160.00	0.30	48.00 Retrieve and circulate various case filings
03/07/2022	BPL	B110	A106	375.00	1.20	450.00 Internal team meeting and call with client regarding pending motions and formulating strategy/responses
03/07/2022	RSG	B110	A104	475.00	0.40	190.00 Review/analyze executed engagement letter and schedule meeting
03/07/2022	RSG	B110	A104	475.00	0.50	237.50 internal meeting with Brad and Margaret regarding: strategy and tasks
03/07/2022	RSG	B110	A104	475.00	0.70	332.50 Review/analyze and draft motions to shorten on retention application and DIP
03/07/2022	RSG	B110	A104	475.00	0.40	190.00 emails and call with United States Trustee
03/07/2022	MFE	B110	A106	400.00	1.40	560.00 Initial discussions with client regarding status of case and upcoming deadlines
03/08/2022	APG	B110	A103	160.00	0.50	80.00 Revise agenda
03/08/2022	APG	B110	A105	160.00	0.20	32.00 Communicate (in firm) regarding hearing appearances
03/08/2022	APG	B110	A111	160.00	0.20	32.00 Finalize and efile motion to shorten notice
03/08/2022	APG	B110	A107	160.00	0.20	32.00 Circulate filed copies of expedited motions and motion to shorten
03/08/2022	APG	B110	A110	160.00	0.50	80.00 Register various zoom appearances and circulate confirmations of same
03/08/2022	APG	B110	A106	160.00	0.30	48.00 Various communications regarding hearing and motions going forward
03/08/2022	APG	B110	A111	160.00	0.20	32.00 Finalize and efile witness notice
03/08/2022	APG	B110	A111	160.00	0.40	64.00 Finalize and efile agenda
03/08/2022	APG	B110	A107	160.00	0.10	16.00 Circulate dropbox of filed documents to counsel
03/08/2022	APG	B110	A108	160.00	0.20	32.00 Coordinate service of documents with Parcels
03/08/2022	APG	B110	A105	160.00	0.20	32.00 Communications regarding exhibits for hearing
03/08/2022	RB	B110	A110	130.00	0.40	52.00 Emails with A. Gollmann regarding agenda prep
03/08/2022	RB	B110	A110	130.00	1.50	195.00 Prepare and draft agenda per A. Gollmann email
03/08/2022	RB	B110	A110	130.00	3.00	390.00 Download all of the voluminous exhibits per D.I. 74 to cloud per M. England email
03/08/2022	RSG	B110	A104	475.00	0.40	190.00 call with client regarding: strategy and status
03/08/2022	RSG	B110	A104	475.00	0.30	142.50 call with Bering Strait counsel
03/08/2022	RSG	B110	A104	475.00	0.40	190.00 emails and call with Jenny Kasen
03/08/2022	RSG	B110	A104	475.00	0.50	237.50 several emails with clients, several more calls with same
03/08/2022	RSG	B110	A104	475.00	0.20	95.00 Review/analyze emails regarding: evidentiary hearing, Mark St. Moritz
03/08/2022	MFE	B110	A103	400.00	0.30	120.00 Revise witness and exhibit list and coordinate filing
03/08/2022	MFE	B110	A104	400.00	0.30	120.00 Review J. Goldblatt's chamber procedures
03/08/2022	MFE	B110	A103	400.00	0.30	120.00 Review and revise hearing agenda
03/09/2022	APG	B110	A110	160.00	0.40	64.00 Print various hearing materials for M. England
03/09/2022	APG	B110	A106	160.00	0.10	16.00 Communicate (with client) regarding zoom log in
03/09/2022	RSG	B110	A104	475.00	0.30	142.50 discussions with Steve on status/strategy
03/09/2022	RSG	B110	A104	475.00	0.50	237.50 pre-hearing prep, review witness lists, documents
03/09/2022	MFE	B110	A104	400.00	0.20	80.00 Review UST's witness list
03/10/2022	BPL	B110	A106	375.00	0.50	187.50 Exchange various emails with client regarding providing further documentation concerning company's ongoing business, taxes, etc.
03/10/2022	APG	B110	A105	160.00	0.40	64.00 Various communications regarding hearings scheduled
03/10/2022	APG	B110	A108	160.00	0.20	32.00 Communications with chambers regarding zoom hearings
03/10/2022	APG	B110	A110	160.00	0.10	16.00 Update file
03/10/2022	RB	B110	A110	130.00	0.50	65.00 Download witness Exhibits 87 to Exhibit 90 to cloud per M. England email
03/10/2022	RSG	B110	A104	475.00	0.50	237.50 conference call with team regarding: status, strategy
03/10/2022	RSG	B110	A104	475.00	0.40	190.00 Review/analyze internal discussions regarding: documents, witnesses with M. England and B. Lehman
03/10/2022	RSG	B110	A104	475.00	0.40	190.00 Review/analyze letter and status of tax returns
03/11/2022	BPL	B110	A106	375.00	0.50	187.50 Emails with client concerning documentation of company's ongoing business and review documents provided
03/11/2022	APG	B110	A111	160.00	0.60	96.00 Finalize and efile agenda for hearing
03/11/2022	APG	B110	A107	160.00	0.10	16.00 Circulate agenda to counsel
03/11/2022	APG	B110	A108	160.00	0.10	16.00 Communicate with chambers regarding agenda filed
03/11/2022	RSG	B110	A104	475.00	0.50	237.50 meet with M. England and B. Lehman before hearing, prepare

## Detail Task Code Billing Report

400290 001

Gellert Scali Busenkell &amp; Brown, LLC

Trans Date	Tkpr	Tcode/ Task Code	Rate	Units	Hours to Bill	Amount
<b>Fees</b>						
03/11/2022	RSG	B110	A104	475.00	0.40	190.00 several emails and calls with Steve regarding: status, strategy etc.
03/11/2022	RSG	B110	A104	475.00	0.30	142.50 emails and call with appellate counsel
03/11/2022	RSG	B110	A104	475.00	0.30	142.50 Review/analyze and edit 3/14 agenda
03/13/2022	RSG	B110	A104	475.00	0.60	285.00 Review/analyze emails/call with Steve, discuss with M. England, review exhibit objection outline
03/14/2022	BPL	B110	A106	375.00	0.30	112.50 Call with client to follow up on the day's proceedings and strategy going forward
03/14/2022	APG	B110	A110	160.00	0.40	64.00 Retrieve and circulate various hearing exhibits
03/14/2022	APG	B110	A108	160.00	0.20	32.00 Communications with chambers regarding zoom log in for hearings
03/14/2022	APG	B110	A111	160.00	0.20	32.00 Finalize and efile agenda for hearing
03/14/2022	APG	B110	A107	160.00	0.20	32.00 Communicate with counsel regarding zoom registration link
03/14/2022	APG	B110	A108	160.00	0.10	16.00 Circulate agenda to chambers
03/14/2022	APG	B110	A110	160.00	0.10	16.00 Update file
03/14/2022	RSG	B110	A104	475.00	0.50	237.50 Review/analyze and prep for hearing
03/14/2022	RSG	B110	A104	475.00	0.50	237.50 call and emails with client about status, next steps
03/14/2022	RSG	B110	A104	475.00	0.20	95.00 Review/analyze emails with United States Trustee
03/15/2022	RSG	B110	A104	475.00	0.30	142.50 Review/analyze status of appeal, follow up with appellate counsel
03/15/2022	RSG	B110	A104	475.00	0.80	380.00 review/revise argument and circulate same for comment
03/15/2022	APG	B110	A107	160.00	0.20	32.00 Various communications regarding zoom hearing link
03/16/2022	MB	B110	A104	450.00	0.10	45.00 Discuss closing argument with R. Gellert
03/16/2022	BPL	B110	A107	375.00	0.30	112.50 Exchange emails with counsel to other parties concerning DIP order
03/16/2022	RSG	B110	A104	475.00	0.40	190.00 discussion with Steve, Brad regarding: status, strategy, emails, calls
03/16/2022	APG	B110	A104	160.00	0.40	64.00 Review various communications regarding hearing
03/16/2022	APG	B110	A110	160.00	0.10	16.00 Print hearing materials for R. Gellert
03/17/2022	RSG	B110	A104	475.00	0.70	332.50 Review/analyze emails, call with Acosta
03/17/2022	RSG	B110	A104	475.00	0.20	95.00 follow up with appellate counsel
03/18/2022	RSG	B110	A104	475.00	0.50	237.50 Review/analyze several emails to/from Steve, review open items
03/22/2022	RSG	B110	A104	475.00	0.40	190.00 emails from/to movants on status of items
03/22/2022	RSG	B110	A104	475.00	0.30	142.50 emails to/from steve regarding: status of claim, appeal
03/23/2022	RSG	B110	A104	475.00	0.40	190.00 several email to/from Steve regarding: status
03/23/2022	RSG	B110	A104	475.00	0.40	190.00 Review/analyze emails from/to Cabot
03/24/2022	RSG	B110	A104	475.00	0.20	95.00 call / email from/to Mike Moody
03/24/2022	RSG	B110	A104	475.00	0.40	190.00 Review/analyze emails requesting standstill until entry of decision, circulate same
03/24/2022	RSG	B110	A104	475.00	0.40	190.00 Review/analyze follow up emails with Cabot et al on status
03/24/2022	RSG	B110	A104	475.00	0.30	142.50 Review/analyze emails on outstanding MOR
03/24/2022	APG	B110	A104	160.00	0.20	32.00 Review communication regarding status of case
03/25/2022	RSG	B110	A104	475.00	0.80	380.00 Review/analyze and circulate Bering reply letter on candor letter from debtor
03/25/2022	RSG	B110	A104	475.00	0.30	142.50 Review/analyze emails from/to Steve regarding: status
03/30/2022	RSG	B110	A104	475.00	0.30	142.50 call with Steve regarding: status
03/31/2022	BPL	B110	A107	375.00	0.40	150.00 Review proposed conversion order and exchange emails with other counsel regarding same
03/31/2022	BPL	B110	A104	375.00	0.60	225.00 Review court's opinion regarding conversion of case to Chapter 7
03/31/2022	RSG	B110	A104	475.00	0.70	332.50 Review/analyze email and call with chapter 7 trustee
03/31/2022	RSG	B110	A104	475.00	0.70	332.50 Review/analyze proposed order from UST converting case, emails regarding: same
03/31/2022	RSG	B110	A104	475.00	0.20	95.00 email parties regarding: obtaining hearing date
03/31/2022	RSG	B110	A104	475.00	0.30	142.50 Review/analyze follow up call with Steve
03/31/2022	APG	B110	A108	160.00	0.20	32.00 Communications regarding omnibus hearing date
03/31/2022	APG	B110	A111	160.00	0.10	16.00 Finalize and efile certification of counsel regarding omnibus hearing date
03/31/2022	APG	B110	A110	160.00	0.20	32.00 Retrieve and circulate order converting case to chapter 7
03/31/2022	APG	B110	A105	160.00	0.10	16.00 Calendar dates/deadlines regarding conversion to chapter 7
04/01/2022	RSG	B110	A104	475.00	1.00	475.00 Review/analyze emails with trustee and calls with Trustee
04/01/2022	RSG	B110	A104	475.00	1.00	475.00 Review/analyze emails with Steve and calls with Steve
04/01/2022	RSG	B110	A104	475.00	0.60	285.00 Review/analyze entry of order and formal selection of trustee
04/01/2022	RSG	B110	A104	475.00	0.30	142.50 Review/analyze emails regarding: bank account number

Subtotal for Phase ID B110

Billable

42.20

14,682.50 Case Administration

## Detail Task Code Billing Report

400290 001

Gellert Scali Busenkell &amp; Brown, LLC

	Trans Date	Tkpr	Tcode/ Task Code	Rate	Units	Hours to Bill	Amount	
<b>Fees</b>								
04/01/2022	RSG	B150	A104	475.00		0.40	190.00	Review/analyze notice of 341 meeting and circulate
	<b>Subtotal for Phase ID B150</b>				Billable	0.40	190.00	Meetings of and Communications with Creditors
03/07/2022	APG	B160	A103	160.00		1.00	160.00	Draft/revise Gellert Scali Busenkell & Brown retention motion
03/08/2022	APG	B160	A111	160.00		0.40	64.00	Finalize and efile Gellert Scali Busenkell & Brown retention application
03/08/2022	APG	B160	A110	160.00		0.20	32.00	Assist with service of Gellert Scali Busenkell & Brown retention application
03/22/2022	RSG	B160	A104	475.00		0.30	142.50	Review/analyze status of Venable retention
03/23/2022	RSG	B160	A104	475.00		0.60	285.00	emails and conference call with Venable counsel regarding: status
03/23/2022	RSG	B160	A104	475.00		0.30	142.50	discuss with Brad and Margaret regarding: strategy and Venable retention
03/24/2022	BPL	B160	A107	375.00		0.70	262.50	Emails with US Trustee and opposing counsel concerning ordinary course professional issues
03/24/2022	RSG	B160	A104	475.00		0.40	190.00	Review/analyze Venable situation with Brad and Margaret
03/24/2022	APG	B160	A104	160.00		0.40	64.00	Review communications regarding OCP declarations
03/24/2022	MFE	B160	A103	400.00		0.30	120.00	Review and revise letter to court regarding Venable engagement
03/24/2022	MFE	B160	A107	400.00		0.80	320.00	Numerous e-mails from opposing counsel regarding engagement of Venable
03/25/2022	RSG	B160	A104	475.00		0.30	142.50	Review/analyze Venable retention application/disinterestedness
03/25/2022	MFE	B160	A104	400.00		0.30	120.00	Receive and review court submission from Bearing Straits regarding engagement of Venable
03/31/2022	RSG	B160	A104	475.00		0.40	190.00	obtain hearing date on retention and first and final fee app
03/31/2022	APG	B160	A105	160.00		0.10	16.00	Communicate with R. Gellert regarding Gellert Scali Busenkell & Brown retention application
03/31/2022	APG	B160	A111	160.00		0.20	32.00	Finalize and efile notice of hearing for Gellert Scali Busenkell & Brown retention application
03/31/2022	APG	B160	A107	160.00		0.10	16.00	Circulate notice of hearing for Gellert Scali Busenkell & Brown retention application
03/31/2022	APG	B160	A105	160.00		0.10	16.00	Calendar objection deadline and hearing date for Gellert Scali Busenkell & Brown retention application
04/11/2022	APG	B160	A103	160.00		0.60	96.00	Begin draft of Gellert Scali Busenkell & Brown first and final fee application
04/19/2022	APG	B160	A103	160.00		0.50	80.00	Draft/revise task code billing report for Gellert Scali Busenkell & Brown first and final fee application
04/22/2022	APG	B160	A103	160.00		1.50	240.00	Revise task code billing report for Gellert Scali Busenkell & Brown first and final fee application
04/25/2022	APG	B160	A103	160.00		2.00	320.00	Revise Gellert Scali Busenkell & Brown first and final fee application
	<b>Subtotal for Phase ID B160</b>				Billable	11.50	3,051.00	Fee/Employment Applications
03/08/2022	APG	B190	A103	160.00		0.50	80.00	Draft/revise motion for leave to file late response
03/08/2022	APG	B190	A103	160.00		0.80	128.00	Draft/revise witness and exhibit list
03/08/2022	APG	B190	A111	160.00		0.20	32.00	Finalize and efile motion for leave to file late responses
03/08/2022	MFE	B190	A103	400.00		0.30	120.00	Revise motion for leave to file late objections
03/10/2022	BPL	B190	A107	375.00		1.30	487.50	Call with creditors' counsel, DoD counsel, and follow-up calls with R. Gellert and M. England
03/10/2022	MFE	B190	A104	400.00		0.30	120.00	Review e-mails received from former counsel
03/10/2022	MFE	B190	A104	400.00		0.30	120.00	Review and provide comments to proposed certification of counsel
03/11/2022	APG	B190	A110	160.00		0.20	32.00	Upload order for leave to file late responses
03/11/2022	MFE	B190	A104	400.00		0.20	80.00	Review proposed certification of counsel regarding exhibits and approve filing
03/11/2022	MFE	B190	A104	400.00		0.20	80.00	Receive and review order granting motion to file late objection
03/25/2022	BPL	B190	A105	375.00		0.40	150.00	Discussion regarding strategy with R. Gellert and M. England
	<b>Subtotal for Phase ID B190</b>				Billable	4.70	1,429.50	Other Contested Matters (excluding assumption/rejection motions)
03/07/2022	RSG	B230	A104	475.00		1.00	475.00	draft DIP motion
03/08/2022	APG	B230	A111	160.00		0.40	64.00	Finalize and efile DIP motion
03/08/2022	RSG	B230	A104	475.00		0.50	237.50	Review/analyze draft budget and term sheet for DIP

## Detail Task Code Billing Report

400290 001

Gellert Scali Busenkell &amp; Brown, LLC

Trans Date	Tkpr	Tcode/ Task Code	Rate	Units	Hours to Bill	Amount
<b>Fees</b>						
03/08/2022	RSG	B230	A104	475.00	0.60	285.00 Review/analyze, revise and circulate DIP motion for review
03/10/2022	BPL	B230	A107	375.00	0.80	300.00 Exchange emails with other counsel concerning hearing scheduling, DIP financing issues, and St. Moritz testimony
03/10/2022	RSG	B230	A104	475.00	0.40	190.00 emails and call with Jenny regarding: DIP, exhibits etc
03/10/2022	RSG	B230	A104	475.00	0.40	190.00 Review/analyze emails, call with Bering Strait regarding: DIP, exhibits etc.
03/10/2022	RSG	B230	A104	475.00	0.50	237.50 review, revise and circulate DIP order
03/10/2022	RSG	B230	A104	475.00	0.40	190.00 Review/analyze additional discussions on DIP
03/10/2022	RSG	B230	A104	475.00	0.80	380.00 conference call on evidence objections, proceeding forward and DIP
03/14/2022	RSG	B230	A104	475.00	0.80	380.00 revise and circulate DIP revisions, Review/analyze multiple emails on comments to same
03/15/2022	BPL	B230	A107	375.00	0.40	150.00 Exchange emails internally and with creditors' counsel concerning various outstanding matters, including DIP order
03/15/2022	RSG	B230	A104	475.00	0.40	190.00 Review/analyze emails to opp counsel regarding: status of DIP, comments
03/15/2022	RSG	B230	A104	475.00	0.90	427.50 Review/analyze DIP edits from opp counsel, prepare redline and Certification of counsel with opposing forms of order
03/15/2022	APG	B230	A104	160.00	0.40	64.00 Review communications regarding revised DIP order
03/15/2022	APG	B230	A111	160.00	0.60	96.00 Finalize and efile certification of counsel with competing DIP orders and redlines of same
03/15/2022	APG	B230	A108	160.00	0.10	16.00 Circulate filed Certification of counsel to chambers regarding competing DIP orders
03/16/2022	RSG	B230	A104	475.00	0.80	380.00 prepare for hearing, DIP issues
03/17/2022	BPL	B230	A107	375.00	0.10	37.50 Exchange emails concerning DIP order
03/17/2022	RSG	B230	A104	475.00	0.40	190.00 Review/analyze, submit and review DIP order
<b>Subtotal for Phase ID B230</b>				Billable	10.70	4,480.00 Financing/Cash Collections
03/09/2022	APG	B310	A110	160.00	0.10	16.00 Retrieve and circulate IRS proof of claim
<b>Subtotal for Phase ID B310</b>				Billable	0.10	16.00 Claims Administration and Objections
03/07/2022	BPL	L240	A104	375.00	0.40	150.00 Review/analyze motions to dismiss/convert
03/07/2022	BPL	L240	A102	375.00	3.90	1,462.50 Perform legal research and analysis concerning legal issues for motion to dismiss/convert
03/07/2022	BPL	L240	A103	375.00	4.00	1,500.00 Draft/review response in opposition to motion to dismiss/convert
03/07/2022	RSG	L240	A104	475.00	0.70	332.50 Review/analyze draft objection
03/08/2022	APG	L240	A111	160.00	0.60	96.00 Finalize exhibits to response to motion to dismiss
03/08/2022	APG	L240	A111	160.00	0.40	64.00 Finalize and efile response to motion to dismiss
03/08/2022	BPL	L240	A103	375.00	1.50	562.50 Draft/review response in opposition to motion to dismiss/convert
03/08/2022	BPL	L240	A101	375.00	4.70	1,762.50 Plan and prepare for 3/9 oral argument on motions to dismiss/convert and for sanctions, including preparation of argument and direct/cross examination outlines
03/08/2022	RSG	L240	A104	475.00	0.50	237.50 Review/analyze objection to MTD
03/09/2022	APG	L240	A110	160.00	0.30	48.00 Retrieve and circulate creditor declarations
03/09/2022	BPL	L240	A109	375.00	8.80	3,300.00 Appear for/attend hearing on motion to dismiss/convert and for sanctions, including pre- and post-hearing strategy discussions with R. Gellert and M. England
03/09/2022	RSG	L240	A104	475.00	4.00	1,900.00 morning session of trial, review IRS claims
03/09/2022	RSG	L240	A104	475.00	3.00	1,425.00 afternoon session of trial, follow up emails regarding DIP structure
03/09/2022	MFE	L240	A109	400.00	8.50	3,400.00 Attend hearing on Motion to Dismiss case and Motion for Sanctions
03/09/2022	MFE	L240	A105	400.00	0.30	120.00 Discussions with R. Gellert and B. Lehman regarding preparation for second day of hearing
03/10/2022	BPL	L240	A101	375.00	3.50	1,312.50 Plan and prepare for ongoing hearing regarding motion to dismiss/convert and motion for sanctions, including preparation of additional direct/cross examination outlines
03/10/2022	MFE	L240	A107	400.00	0.40	160.00 Numerous e-mails to and from opposing parties and court regarding hearing scheduling and witness availability
03/11/2022	BPL	L240	A104	375.00	1.80	675.00 Review/analyze discovery documents, exhibits, and expert report in order to prepare outline/analysis of transfers at issue for purposes of the motion to dismiss and for sanctions

## Detail Task Code Billing Report

400290 001

Gellert Scali Busenkell &amp; Brown, LLC

	<u>Trans Date</u>	<u>Tkpr</u>	<u>Tcode/ Task Code</u>	<u>Rate</u>	<u>Units</u>	<u>Hours to Bill</u>	<u>Amount</u>
<b>Fees</b>							
03/13/2022	BPL	L240	A101	375.00		3.20	1,200.00 Plan and prepare for upcoming continued hearing on motion to dismiss/convert and for sanctions, including argument and examination outlines/exhibits
03/14/2022	BPL	L240	A109	375.00		5.90	2,212.50 Prepare for and attend continued hearing on motions to dismiss/convert and for sanctions
03/14/2022	BPL	L240	A103	375.00		0.80	300.00 Review/review outline for closing argument regarding motions to dismiss/convert and for sanctions
03/14/2022	RSG	L240	A104	475.00		5.90	2,802.50 continued hearing
03/14/2022	RSG	L240	A104	475.00		0.40	190.00 Review/analyze revised document objection outline
03/14/2022	MFE	L240	A101	400.00		3.50	1,280.00 Plan and prepare for continued hearing on motion to dismiss and motion for sanctions and argument on evidentiary issues
03/14/2022	MFE	L240	A109	400.00		3.60	1,440.00 Attend hearing on motion to dismiss or convert and motion for sanctions
03/15/2022	BPL	L240	A101	375.00		3.50	1,312.50 Plan and prepare for continued hearing on motions to dismiss/convert and for sanctions, including preparation of notes and outlines
03/16/2022	BPL	L240	A109	375.00		5.60	2,100.00 Prepare for and attend continued hearing on motions to dismiss/convert and for sanctions
03/16/2022	RSG	L240	A104	475.00		4.50	2,137.50 continued trial
03/17/2022	RSG	L240	A104	475.00		0.50	237.50 Review/analyze status on FEMA claim
03/18/2022	BPL	L240	A106	375.00		0.30	112.50 Emails with client to follow up on motion to dismiss hearing and strategy
03/18/2022	RSG	L240	A104	475.00		0.40	190.00 Review/analyze status of appeal, tax returns and FEMA claim
03/23/2022	BPL	L240	A106	375.00		0.60	225.00 Discussion with client and internally regarding status of FEMA claims
03/23/2022	BPL	L240	A107	375.00		0.50	187.50 Call with debtor's counsel at Venable concerning status of FEMA claims and timing of submission of newer claim
03/23/2022	BPL	L240	A103	375.00		0.60	225.00 Prepare letter to court regarding issues with prior testimony concerning newer FEMA claim
03/23/2022	BPL	L240	A105	375.00		0.20	75.00 Discussion with R. Gellert and M. England regarding issues with prior testimony concerning FEMA claim status
03/23/2022	MFE	L240	A105	400.00		0.40	160.00 Various discussions with R. Gellert and B. Lehman regarding engagement of Venable
03/23/2022	MFE	L240	A106	400.00		0.40	160.00 E-mail to S. Acosta regarding engagement of Venable
03/24/2022	BPL	L240	A103	375.00		0.80	300.00 Draft/review letter to Court regarding inaccurate prior testimony concerning FEMA claim status
03/24/2022	BPL	L240	A107	375.00		0.30	112.50 Emails and call with opposing counsel concerning FEMA claim status issues
03/24/2022	RSG	L240	A104	475.00		0.50	237.50 Review/analyze draft letter to Court correcting testimony regarding FEMA claim, discussions regarding: same
03/24/2022	APG	L240	A105	160.00		0.30	48.00 Various communications regarding letter regarding FEMA claim
03/24/2022	APG	L240	A111	160.00		0.20	32.00 Finalize and efile letter regarding FEMA claim
03/24/2022	APG	L240	A108	160.00		0.10	16.00 Circulate filed letter regarding FEMA claim to chambers
03/25/2022	BPL	L240	A104	375.00		0.20	75.00 Review/analyze Bering Straits' filing regarding FEMA claim status
03/30/2022	APG	L240	A104	160.00		0.30	48.00 Review and circulate memorandum opinion regarding motion to dismiss
03/30/2022	RSG	L240	A104	475.00		0.50	237.50 Review/analyze emails and calls regarding: opinion
03/30/2022	RSG	L240	A104	475.00		0.50	237.50 Review/analyze and circulate opinion
03/30/2022	MFE	L240	A104	400.00		0.50	200.00 Receive and review court's ruling converting case to Chapter 7
03/31/2022	RSG	L240	A104	475.00		0.40	190.00 Review/analyze continue review of opinion
03/31/2022	RSG	L240	A104	475.00		0.40	190.00 Review/analyze follow up call with Steve on opinion and what happens next
03/31/2022	MFE	L240	A107	400.00		0.30	120.00 Various e-mails from opposing counsel regarding order implementing court's opinion
Subtotal for Phase ID L240				Billable	93.40	37,099.50	Dispositive Motions
03/08/2022	MFE	L310	A104	400.00		0.30	120.00 Receive and review subpoena for Deborah Mott
Subtotal for Phase ID L310				Billable	0.30	120.00	Written Discovery
03/09/2022	APG	L320	A110	160.00		0.30	48.00 Review document production for TD bank statements

## Detail Task Code Billing Report

400290 001

Gellert Scali Busenkell &amp; Brown, LLC

	Trans Date	Tkpr	Tcode/ Task Code	Rate	Units	Hours to Bill	Amount	
<b>Fees</b>								
Subtotal for Phase ID L320					Billable	0.30	48.00	Document Production
03/09/2022	MFE	L340	A104	400.00		0.40	160.00	Receive and review report of Ryan Orner
Subtotal for Phase ID L340					Billable	0.40	160.00	Expert Discovery
03/07/2022	MFE	L350	A103	400.00		5.20	2,080.00	Begin drafting opposition to GPDEV's Motion for Rule 37 Sanctions against Debtor
03/07/2022	MFE	L350	A106	400.00		0.40	160.00	Various e-mails to and from Debtor regarding opposition to Motion for Sanctions
03/07/2022	MFE	L350	A104	400.00		1.10	440.00	Review exhibits submitted by GPDEV for upcoming hearing
03/07/2022	BPL	L350	A104	375.00		0.40	150.00	Review/analyze motion for sanctions
03/07/2022	BPL	L350	A104	375.00		1.10	412.50	Review/receive opposition to motion for sanctions
03/08/2022	APG	L350	A111	160.00		0.20	32.00	Finalize and efile opposition to motion for sanctions
03/08/2022	RSG	L350	A104	475.00		0.50	237.50	Review/analyze objection to motion for sanctions
03/08/2022	MFE	L350	A103	400.00		3.80	1,520.00	Finalize and coordinate filing of opposition to GPDEV's Motion for Rule 37 Sanctions against Debtor
03/08/2022	MFE	L350	A106	400.00		0.30	120.00	E-mails to and from client regarding documents produced
03/08/2022	MFE	L350	A101	400.00		2.80	1,120.00	Prepare for upcoming hearing on Motion for Sanctions
03/08/2022	MFE	L350	A106	400.00		0.80	320.00	Teleconference with client regarding hearing on Motion for Sanctions
03/08/2022	BPL	L350	A103	375.00		1.00	375.00	Draft/review response in opposition to motion for sanctions
03/09/2022	MFE	L350	A104	400.00		0.30	120.00	Receive and review declaration of G. Peterson
03/14/2022	APG	L350	A104	160.00		0.30	48.00	Review and circulate Mott deposition transcript
03/14/2022	RSG	L350	A104	475.00		0.50	237.50	Review/analyze sanctions objection outline for argument
Subtotal for Phase ID L350					Billable	18.70	7,372.50	Discovery Motions
03/10/2022	MFE	L390	A107	400.00		1.10	440.00	Numerous e-mails to and from counsel for creditors regarding issues with exhibits
03/10/2022	MFE	L390	A107	400.00		1.00	400.00	Participate in meet and confer with counsel for creditors and US Trustee regarding evidentiary issues
03/10/2022	MFE	L390	A104	400.00		1.30	520.00	Review creditor's proposed exhibits to determine possible objections to admissibility
03/10/2022	MFE	L390	A107	400.00		0.40	160.00	Teleconference with counsel for creditor regarding scheduling meet and confer and other objections
03/10/2022	MFE	L390	A106	400.00		0.40	160.00	Discussions with client regarding evidentiary issues and documents
03/15/2022	MFE	L390	A107	400.00		0.30	120.00	Receive and review request from counsel for creditor regarding admissibility of Orner's report
03/16/2022	MFE	L390	A104	400.00		0.20	80.00	Review/analyze request from counsel for creditor regarding admission of transcript of D. Mott and coding
Subtotal for Phase ID L390					Billable	4.70	1,880.00	Other Discovery
<b>Total for Fees</b>					Billable	187.40	70,529.00	
<b>Expenses</b>								
03/08/2022	RSG	B110	E101	0.100	5.00		0.50	Photocopies.
03/08/2022	RSG	B110	E101	0.100	3.00		0.30	Photocopies.
03/08/2022	RSG	B110	E101	0.100	2.00		0.20	Photocopies.
03/08/2022	RSG	B110	E101	0.100	194.00		19.40	Photocopies.
03/08/2022	RSG	B110	E101	0.100	6.00		0.60	Photocopies.
03/08/2022	RSG	B110	E101	0.100	306.00		30.60	Photocopies.
03/08/2022	RSG	B110	E101	0.100	680.00		68.00	Photocopies.
03/08/2022	RSG	B110	E101	0.100	2.00		0.20	Photocopies.
03/08/2022	RSG	B110	E101	0.100	6.00		0.60	Photocopies.
03/08/2022	RSG	B110	E101	0.100	96.00		9.60	Photocopies.
03/08/2022	RSG	B110	E108	2.160	17.00		36.72	Postage
03/09/2022	RSG	B110	E101	0.100	5.00		0.50	Photocopies.
03/09/2022	RSG	B110	E101	0.100	2.00		0.20	Photocopies.
03/09/2022	RSG	B110	E101	0.100	4.00		0.40	Photocopies.

## Detail Task Code Billing Report

400290 001

Gellert Scali Busenkell &amp; Brown, LLC

Trans Date	Tkpr	Tcode/ Task Code	Rate	Units	Hours to Bill	Amount
<b>Expenses</b>						
03/09/2022	RSG	B110	E101	0.100	8.00	0.80 Photocopies.
03/09/2022	RSG	B110	E101	0.100	2.00	0.20 Photocopies.
03/09/2022	RSG	B110	E101	0.100	24.00	2.40 Photocopies.
03/09/2022	RSG	B110	E101	0.100	55.00	5.50 Photocopies.
03/09/2022	RSG	B110	E101	0.100	55.00	5.50 Photocopies.
03/10/2022	RSG	B110	E124		686.08	Parcels
03/11/2022	RSG	B110	E101	0.100	85.00	8.50 Photocopies.
03/14/2022	RSG	B110	E101	0.100	26.00	2.60 Photocopies.
03/14/2022	RSG	B110	E101	0.100	21.00	2.10 Photocopies.
03/14/2022	RSG	B110	E101	0.100	85.00	8.50 Photocopies.
03/14/2022	RSG	B110	E101	0.100	2.00	0.20 Photocopies.
03/14/2022	RSG	B110	E101	0.100	8.00	0.80 Photocopies.
03/16/2022	RSG	B110	E101	0.100	16.00	1.60 Photocopies.
03/16/2022	RSG	B110	E101	0.100	19.00	1.90 Photocopies.
03/16/2022	RSG	B110	E101	0.100	19.00	1.90 Photocopies.
03/16/2022	RSG	B110	E101	0.100	16.00	1.60 Photocopies.
03/31/2022	RSG	B110	E108	0.530	16.00	8.48 Postage
03/31/2022	RSG	B110	E101	0.100	32.00	3.20 Photocopies.
03/31/2022	RSG	B110	E101	0.100	2.00	0.20 Photocopies.
03/31/2022	RSG	B110	E124		348.80	Pacer Charges

Subtotal for Phase ID B110	Billable	0.00	1,258.68	Case Administration
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<b>Total for Expenses</b>	Billable	0.00	1,258.68	
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**GRAND TOTALS**

Billable	187.40	71,787.68
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